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Kevin Halpern and  
Celluride Wireless, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KEVIN HALPERN; CELLURIDE  
WIRELESS INC.,

Plaintiffs,

v.

UBER TECHNOLOGIES INC., TRAVIS  
KALANICK, GARRETT CAMP, BILL  
TRENCHARD, SCOTT BELSKY, BILL  
GURLEY, BENCHMARK CAPITAL,  
BENCHMARK, FOUNDER COLLECTIVE,  
FIRST ROUND CAPITAL, RAISER L.L.C.,  
RAISER CA L.L.C. and DOES 1-250,

Defendants.

CASE NO.: 4:15-CV-02401-JSW

Judge: Hon. Jeffrey S. White  
Courtroom: 5

**JOINT STIPULATION AND  
DEMONSTRATION OF GOOD CAUSE  
TO CONTINUE THE HEARING AND  
BRIEFING SCHEDULE ON THE  
MOTION TO DISMISS FILED BY  
DEFENDANTS AND THE CASE  
MANAGEMENT CONFERENCE; AND  
REQUEST FOR ORDER**

**~~PROPOSED~~ ORDER GRANTING  
STIPULATED REQUEST TO  
CONTINUE HEARING AND BRIEFING  
SCHEDULE ON MOTION TO DISMISS  
AND CONTINUING CASE  
MANAGEMENT CONFERENCE  
AS MODIFIED HEREIN**

Hearing

Date: August 28, 2015

Time: 9:00 a.m.

Courtroom: 5

Stipulation and ~~Proposed~~ Order To Continue Hearing Dates on Motions to Dismiss  
and to Continue the Case Management Conference Date.

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2  
3 The parties submit the following stipulation and demonstration of good cause to continue  
4 the hearing and briefing schedule on the defendants' motion to dismiss pursuant to the  
5 requirements in the Court's General Civil Standing Order, number 4.

6 WHEREAS Defendants filed two motions to dismiss on July 13, 2015 that seek to have  
7 all defendants dismissed from the case.

8  
9 WHEREAS Defendants' motions to dismiss are currently set for hearing on August 28,  
10 2015, and Plaintiff's oppositions are due on July 27, 2015, pursuant to Local Rule 7-3(a).

11 WHEREAS on July 16, 2015, Plaintiff's Counsel emailed Defendants' Counsel and  
12 informed him that he is out of the United States on vacation and will be gone over the next three  
13 weeks on vacation and then dealing with some family business. Plaintiff's Counsel requested a  
14 three week extension of the hearing and of Plaintiff's time to respond to the motion.  
15

16 WHEREAS the initial case management conference in this case is also set for August 28,  
17 2015. The case management conference is set for 11:00 a.m. in Courtroom 5.

18 THE PARTIES HEREBY SUBMIT THAT GOOD CAUSE EXISTS AND  
19 THEREUPON STIPULATE to have the hearings on Defendants' motions to dismiss continued  
20 from August 28 to September 11, 2015, or as soon thereafter as the Court is available. The  
21 parties also stipulate to continue the deadline for Plaintiff to file his oppositions to the motions to  
22 August 17, 2015 and the deadline for the Defendants' replies to August 28, 2015.  
23

24 THE PARTIES SUGGEST AND STIPULATE that it would preserve judicial resources  
25 to continue the case management conference date to coincide with the new date for the motions  
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Stipulation and ~~Proposed~~ Order To Continue Hearing Dates on Motions to Dismiss  
and to Continue the Case Management Conference Date.

1 to dismiss and to continue the deadline to submit the joint case management conference  
2 statement to one week before the new case management conference date.

3  
4 Dated: July 22, 2015

THE DOLAN LAW FIRM

5 By: /s/ Christopher B. Dolan  
6 Christopher B. Dolan  
7 Attorneys for Plaintiffs Kevin Halpern and  
8 Celluride Wireless Inc.

9 Dated: July 22, 2015

DURIE TANGRI, LLP

10 By: /s/ Ragesh K. Tangri  
11 Ragesh K. Tangri  
12 Attorneys for Defendants Uber Technologies, Inc.,  
13 Travis Kalanick, Garret Camp, Bill Trenchard, etc.

~~[PROPOSED]~~

**ORDER GRANTING STIPULATED REQUEST TO  
CONTINUE HEARING AND BRIEFING SCHEDULE**

Pursuant to the stipulation of the parties, the Court finds good cause to continue the hearing and briefing schedule on the defendants' motion to dismiss that is currently set for hearing on August 28, 2015. The Court hereby issues the following schedule for the motion.

- 1) The motion to dismiss will be heard on September 18, 2015 at 9:00 a.m., in Courtroom 5.
- 2) Plaintiff's opposition to the motion is due August 17, 2015.
- 3) Defendants' reply to Plaintiff's opposition is due August 28, 2015.
- 4) The case management conference, currently set for August 28, 2015, will be VACATED and rescheduled after the Court has resolved all of the pending motions. continued to September       , 2015 at        a.m. in Courtroom 5.
- 5) ~~The joint case management conference statement will be due on September       , 2015, one week before the case management conference hearing.~~

IT IS SO ORDERED.

Dated: July 23, 2015

By: 

Hon. Jeffrey S. White

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Stipulation and [Proposed] Order To Continue Hearing Dates on Motions to Dismiss  
and to Continue the Case Management Conference Date.